

UNIDEN

SEP 09 1994

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COMMUNICATIONS

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the matter of)
)
Amendment of the Commission's Rules)
to Establish a New Radio Service)

RM-8499

REPLY COMMENTS OF
UNIDEN AMERICA CORPORATION

INTRODUCTION

1. Uniden America Corporation (hereinafter "Uniden") respectfully submits its reply comments to the above captioned Petition for Rule Making ("Petition"). It should be noted that Uniden currently markets products designed to operate within the bands assigned to the General Mobile Radio Service ("GMRS") which is the same spectral area proposed in the Petition.

2. Uniden has read the Petition, as well as the comments filed with the Commission as of August 26, 1994. We support the comments filed by Motorola and the Telecommunications Industry Association ("TIA") and believe that the Family Radio Service ("FRS") proposed by the Radio Shack Division of Tandy Corporation ("Tandy") will benefit and efficiently

serve more users as compared to the current GMRS and Citizens Band Radio Service ("CB"). Furthermore, we disagree with the opposing comments in that it appears that they, the commenters, attempted to use rhetorical phrases merely to block the advancement of the Petition into the service envisioned by Tandy.

DISCUSSION

3. The comments filed by Dr. Michael C. Trahos ("Trahos") appear to focus on the assumption that there will be a "flood" of devices which would be prone to operate "off frequency" causing havoc with existing GMRS repeater operations and "jeopardize any chance for the future evolution of digital and narrow-band repeater technology in the GMRS". First, Uniden does not believe that a "500 milliwatt, palm-size transceiver" would "flood" the spectrum. Further, the frequency stability in modern communications transceivers of this type ^{1/} is such that it is very seldom for the frequency to drift more than a fraction of the amount as compared to devices a few years ago. The commenter failed to consider that equipment manufacturers must design devices of this type to meet the rigors of the equipment authorization process prescribed by the Commission whereby

^{1/} 47 CFR 95.621(b) specifies a frequency tolerance of 0.0005% for this type of device. Routine measurements indicate much tighter frequency stabilities are maintained.

frequency stability is one of the prime considerations for approval. Concerning future technologies, it is expected that there must be coexistence with present day technologies such as conventional frequency modulated schemes. The FRS places no greater burden than the current GMRS in designing new technologies. For the reasons stated herein, we feel that the Trahos comments should not be considered.

4. The comments of REACT International, Inc. ("REACT") acknowledge the "need for additional, low cost, consumer grade radio communications alternatives", but basically oppose the Tandy proposal as they believe the "Family Radio Service will serve to heighten confusion in the GMRS regarding proper channel selection and use" and that "GMRS provides a more ordered environment that allows for community service" because of the licensing requirements. Uniden does not agree with this explanation in that there is no current mandate in the GMRS rules regarding channel selection on the interstitial channels. While Uniden agrees with the belief that licensing requirements in a licensed service result in a more "ordered environment" it also believes that the Family Radio Service as proposed will ultimately result in less misuse in the GMRS as well as in other licensed services. Uniden strongly asserts that by giving private individuals a service that is not inhibited by the licensing requirements and restrictions, they will opt for a "legal" communications

system rather than using the current licensed services "illegally". As an example, it is our understanding that there is a large segment of radio users that currently utilize GMRS frequencies, as well as Private Land Mobile Radio Services ("PLMRS") frequencies, without obtaining the proper license. Uniden believes that the FRS will reduce this practice.

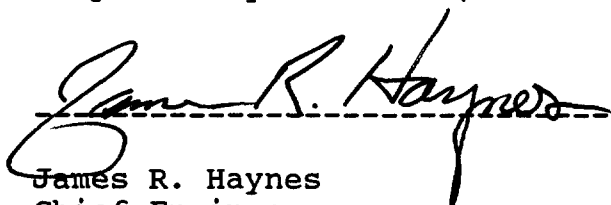
5. Uniden agrees that the CB frequencies, while serving a need with some users, are less than ideal for many who just want to talk "car to car" when travelling, or when used in neighborhood patrols as envisioned by Tandy. We believe that the FRS will provide a much superior service than the current CB service used for these purposes.

6. The comments of the Personal Radio Steering Group, Inc. ("PRSG") are full of rhetorical remarks about issues not related to the Petition in any way. It appears that PRSG is making an attempt to protect their own network of GMRS licensees by making unsubstantiated comments against the potential for FRS. What is not argued by PRSG is that many more people will be served, spectrum reuse will increase, and that a low cost, consumer grade, communications system will be made available to those who would otherwise do without.

CONCLUSION

7. Uniden supports the proposed FRS as envisioned by Tandy. Contrary to some comments filed, we believe that FRS is a new and novel concept that could benefit many citizens. As a further advantage, we believe that FRS will minimize some of the "illegal misuse" within the licensed GMRS as well as the PLMRS. For the reasons stated in these reply comments, Uniden urges the Commission to propose the rules for creating the new Family Radio Service.

Respectfully submitted,

A handwritten signature in cursive script, reading "James R. Haynes", is written over a horizontal dashed line.

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CERTIFICATE OF SERVICE

COMMUNICATIONS

I, James R. Haynes, hereby certify that copies of the foregoing "Reply Comments" in RM-8499 were mailed first-class, postage prepaid, to the following on this eighth day of September 1994.

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